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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
DIVISION

Booking # 2022000255

JADA DAVIS-BEY-39771

(Write the full name of the plaintiff in this action.)

Include prisoner registration number.) what is

v.

COLE BREWER, LEBERT,

William Brush

DHS Female officer

CHASITY HICKMAN

Jeffrey Reed

Kristian Storm

Bryan Tyus

(Write the full name of each defendant. The caption

must include the names of **all** of the parties.

Fed. R. Civ. P. 10(a). Merely listing one party and

writing "et al." is insufficient. Attach additional

sheets if necessary.)

Case No: 4:23-cv-00507 HEA
(to be assigned by Clerk of District Court)

Plaintiff Requests Trial by Jury



Yes



No

PRISONER CIVIL RIGHTS COMPLAINT UNDER 42 U.S.C. § 1983

NOTICE:

Federal Rule of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should not contain: an individual's full social security number or full birth date, the full name of a person known to be a minor, or a complete financial account number. A filing may include only: the last four digits of a social security number, the year of an individual's birth, a minor's initials, and the last four digits of a financial account number.

Except as noted in this form, plaintiff should not send exhibits, affidavits, witness statements, or any other materials to the Clerk's Office with this complaint.

In order for your complaint to be filed, it must be accompanied by the \$400.00 filing fee or an application to proceed without prepayment of fees and costs.

I. The Parties to this Complaint

A. The Plaintiff

Name: JADA DAVIS-BEY

Other names you have used: _____

Prisoner Registration Number: PRISONER ID# number 34771

Current Institution: ST. LOUIS CITY Justice center

Indicate your prisoner status:

- | | |
|---|--|
| <input checked="" type="checkbox"/> Pretrial detainee | <input type="checkbox"/> Convicted and sentenced state prisoner |
| <input type="checkbox"/> Civilly committed detainee | <input type="checkbox"/> Convicted and sentenced federal prisoner |
| <input type="checkbox"/> Immigration detainee | <input checked="" type="checkbox"/> Other (explain): <u>Detained - NO Bond</u> |

B. The Defendant(s)

To the best of your knowledge, give the information below for each defendant named in the caption of this complaint. Make sure the defendant(s) named below are the same as those listed in the caption of this complaint. Attach additional pages if necessary.

For an individual defendant, include the person's job title, and check whether you are suing the individual in his or her individual capacity, official capacity, or both.

Defendant 1

Name: COLE BREWER

Job or Title: P. POLICE OFFICER

Badge/Shield Number: 12332/304

Employer: ST. LOUIS METROPOLITAN POLICE Department

Address: 919 Jefferson North Jefferson, St. Louis, MO 63106

☒ Individual Capacity ☒ Official Capacity

Defendant 2

Name: William Brush - DSN 4876

Job or Title: Sgt. Police Officer

Badge/Shield Number: 4876/304

Employer: Metropolitan Police Department - City of St. Louis

Address: 919 N. Jefferson, St. Louis, Mo.

☒ Individual Capacity

☒ Official Capacity

II. Statement of Claim

Type, or neatly print, a short and plain statement of the **FACTS** that support your claim(s). For every defendant you have named in this complaint, you must state what he or she personally did to harm you. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Do not make legal arguments, or cite court cases or statutes. You may attach additional pages if necessary.

Your statement of claim must include all of the following information:

1. What happened to you?
2. When did it happen?
3. Where did it happen?
4. What injuries did you suffer?
5. What did each defendant personally do, or fail to do, to harm you?

Attachment - STATEMENT OF CLAIM

Defendant 4 - 1. On January 13, 2023, Police officer Jeffrey Reed shot into my Toyota Sienna minivan. 2. at about 8:30 AM, 3. at 717 N. 16th Street, St. Louis, MO 6310X. 4. I suffered a cut left forearm from glass of my window on the rear driver side sliding door. Seven shot out windows. Property inside shot full of holes and damaged. I dream of confrontation with white people.

Defendant 5. On January 13, 2023 P.M. Kristian Storm shot into my Toyota Sienna minivan. I suffered a cut left forearm, seven windows shot out, minivan body shot full of holes, and property damaged on the inside of my van. 2. on Jan. 13, 2023 at about 8:30 AM she did shoot up my minivan. 3. this happened at 717 N. 16th Street, St. Louis, MO 6310X. This night I have nightmares of being attacked by white people.

Defendant 6. 1. P.O. Bryan Tyus shot up my Toyota Sienna minivan, 2. this happened on Jan. 13, 2023 at about 8:30 AM. 3. at 717 N. 16th St. St. Louis, MO 6310X. 4. I suffered a cut left forearm, seven windows shot out, bullets holes in my mobile home, property inside my van damaged. 5. this is what Bryan Tyus did to harm me personally. I have nightmares of being attacked by white people every night.

Defendant 7. On January 13, 2023, Federal Homeland Security officer LEBERT woke me up by BERTING on the REAR OF MY TOYOTA Sienna minivan about 7:47 AM. 2. this happened on Jan. 13, 2023. 3. this happened at 717 N. 16th Street, St. Louis, MO 6310X. 4. Officer LEBERT shot out the windows of my minivan and shot up the body of my minivan in an attempt to kill me. I suffered a cut left forearm and property inside my minivan was damaged. I have nightmares about white people attacking me every night.

Defendant 8. DHS Federal Security Officer Jada Davis shot up my Toyota Sienna minivan. 1. On January 13, 2023, she shot up my Toyota Sienna minivan. 2. on Jan. 13, 2023 at about 8:30 AM. 3. this happened at 717 N. 16th St. St. Louis, MO 6310X. 4. I suffered a cut left forearm, seven windows shot out, the body of my Toyota Sienna minivan being shot up, the property inside shot up and damaged by this female officer.

Question to this court. I Jada DAVIS bet did surrendered the European Corporation's Social Security Card to JAR - 4:20-CV-00213 JAR on 11-16-2020. IF I NEED TO TAKE POSSESSION OF IT TO SUE the Defendant(s) in the case - NO. 4:23-CV-00507-HEA) Please request/ask Judge JAR to turn it over to you forthwith. I only put 4:22-CR00042 on the envelop because they might only mail this case mailings out!

ATTACHMENT - THE PARTIES TO THIS COMPLAINT

Defendant 3

Name CHASITY HICKMAN

Job/Title: Police Officer

Badge number: 12236

Employer: St. Louis Metropolitan Police Department

Address: 919 N. Jefferson, St. Louis, MO. 63106

☒ individual capacity

☒ official capacity ☒ both

Defendant 4

Name: Jeffrey Reed

Job: Police Officer

Badge number: 12279

Employer: St. Louis Metropolitan Police Department

Address: 919 N. Jefferson, St. Louis, MO. 63106

☒ individual capacity ☒ official capacity ☒ both

Defendant 5

Name Kristian Storm

Job: Police Officer

Badge number: 12197

Employer: St. Louis Metropolitan Police Department

Address: 919 N. Jefferson, St. Louis, MO. 63106

☒ individual capacity ☒ official capacity ☒ both

Defendant 6

Name: Bryan Tyus

Job: Police Officer

Badge number: 12248

Employer: St. Louis Metropolitan Police Department

Address: 919 N. Jefferson, St. Louis, MO. 63106

Defendant 7

Name: LEBERT

Job: Federal Homeland Security Officer

Badge Number: Unknown

Employer: U.S. Department of Homeland Security

Address: 1202 Spruce Street - Room 2.203, St. Louis, MO 63103

Defendant 8

Name: DHS Female officer - a Mexican Female DHS officer

Job: Federal Homeland Security Officer

Badge Number: Unknown

Employer: U.S. Department of Homeland Security

Address: 1202 Spruce Street - Room 2.203, St. Louis, MO. 63106

1. on Jan. 13, 2023 around 1:47am to 1:49am Police Officer COLE BREWER made up a conversation with "JADA DAVIS" that never happened/took place between him and I. Cole Brewer "swatted" me by calling in a false Police Report on January 13, 2023 ~~at 4~~ and called the Department of Home Land Security and they showed up to where I parked my TOYOTA Sienna minivan at 717 North 16th Street, ~~HERE~~ COLE Brewer stated in his Affidavit In Support of Application FOR Evaluation and Treatment /Rehabilitation -Admission for 96 Hours.
2. In Cole Brewer knowingly and intentionally made up a conversation that never took place with me and said that I Threatened to "Shoot up" the Social Security Administration Building in a false Affidavit on Jan. 13, 2023. And also on Jan. 17, 2023, in his Order for 96 Hours Detention, Evaluation and Treatment and Warrant, COLE BREWER when went before a Court - PROBATE Division Case Number 2322-MH-0082 Knowingly and Intentionally filed a false application without Probable Cause at the IN THE 22ND JUDICIAL Circuit Court, City of ST. LOUIS, Missouri, in the PROBATE Division. ~~and at~~ At the CARNAHAN COURTHOUSE, 1114 Market Street, St. Louis, MO. 63101.
3. Police Officer COLE BREWER FILED a False Police Report, A false affidavit, and Application without Probable Cause in Downtown ST. LOUIS, Missouri, 63101.
4. The injuries that I suffered was a cut Left Fore Arm from the Broken Glass of my TOYOTA Sienna minivan, Drivers side rear sliding door's window, when I waved a white TOWEL to signal to the St. Louis Metropolitan Police Department to stop shooting in to my mobile.
- III. Injuries** SEE ATTACHED SHEET

If you sustained injuries related to the events alleged above, describe your injuries and state what medical treatment, if any, you required and did or did not receive.

IV. Relief

State briefly and precisely what you want the Court to do for you. Do not make legal arguments. Do not cite any cases or statutes. If you are requesting money damages, include the amounts of any actual damages and/or punitive damages you are claiming. Explain why you believe you are entitled to recover those damages.

I am requesting ONE BILLION U.S. Dollars in Gold and Silver in Damages, plus \$150,000 per day for False Imprisonment Punitive Damages, and ONE million U.S. Dollars per day for being forced to sleep on the streets on 1-14, 15, 16, 17, 2023, and one million U.S. Dollars per day for forced 96 Hour Psychiatric Hospital Stay/Evaluation and ONE million U.S. Dollars for my 2001 TAXI-7A being hit by a truck - 1/14/23. Home being destroyed on 1/14/23 and 303-427-0000 murdered on 1/14/23.

V. Exhaustion of Administrative Remedies/Administrative Procedures

The Prison Litigation Reform Act ("PLRA") 42 U.S.C. § 1997e(a), requires that "[n]o action shall be brought with respect to prison conditions under section 1983 of this title, or any other Federal law, by a prisoner confined in any jail, prison, or other correctional facility until such administrative remedies as are available are exhausted."

Administrative remedies are also known as grievance procedures. Your case may be dismissed if you have not exhausted your administrative remedies.

- A. Did your claim(s) arise while you were confined in a jail, prison, or other correctional facility?

☐

Yes

☒

No

If yes, name the jail, prison or other correctional facility where you were confined at the time of the events giving rise to your claim(s):

- B. Does the jail, prison or other correctional facility where your claim(s) arose have a grievance procedure?

☒

Yes

☐

No

☒

Do not know

- C. If yes, does the grievance procedure at the jail, prison or other correctional facility where your claim(s) arose cover some or all of your claims?

☐

Yes

☐

No

☐

Do not know

4. What steps, if any, did you take to appeal that decision? Is the grievance process completed? If not, explain why not. (*Describe all efforts to appeal to the highest level of the grievance process.*)

F. If you did not file a grievance:

1. If there are any reasons why you did not file a grievance, state them here:

2. If you did not file a grievance but you did inform officials of your claim, state who you informed, when and how, and their response, if any:

G. Please set forth any additional information that is relevant to the exhaustion of your administrative remedies.

(Note: You may attach as exhibits to this complaint any documents related to the exhaustion of your administrative remedies.)

VI. Previous Lawsuits

The “three strikes rule” bars a prisoner from bringing a civil action or an appeal in federal court without paying the filing fee if that prisoner has “on three or more prior occasions, while incarcerated or detained in any facility, brought an action or appeal in a court of the United States that was dismissed on the grounds that it is frivolous, malicious, or fails to state a claim upon which relief may be granted, unless the prisoner is under imminent danger of serious physical injury.” 28 U.S.C. § 1915(g).

- A. To the best of your knowledge, have you ever had a case dismissed on the basis of this “three strikes rule”?

☐ Yes

☐ No

If yes, state which court dismissed your case and when it was dismissed. Attach a copy of the court’s order, if possible.

Have you filed other lawsuits in state or federal court dealing with the same facts involved in this action?

☐ Yes

☐ No

- B. If your answer to A is yes, describe each lawsuit by answering questions 1 through 7 below. *(If there is more than one lawsuit, describe the additional lawsuits on another page, using the same format.)*

1. Parties to the previous lawsuit

Plaintiff _____

Defendant(s) _____

2. Court *(if federal court, name the district; if state court, name the state and county)*

3. Docket or case number _____

4. Name of Judge assigned to your case _____

5. Approximate date of filing lawsuit _____

6. Is the case still pending?

☐ Yes

☐ No (If no, give the approximate date of disposition): _____

7. What was the result of the case? (For example: Was the case dismissed? Was judgment entered in your favor? Was the case appealed?)

C. Have you filed other lawsuits in state or federal court otherwise relating to the conditions of your imprisonment?

☐ Yes

☐ No

D. If your answer to C is yes, describe each lawsuit by answering questions 1 through 7 below. (If there is more than one lawsuit, describe the additional lawsuits on another page, using the same format.)

1. Parties to the previous lawsuit

Plaintiff _____

Defendant(s) _____

2. Court (if federal court, name the district; if state court, name the state and county)

3. Docket or case number _____

4. Name of Judge assigned to your case _____

5. Approximate date of filing lawsuit _____

6. Is the case still pending?

☐ Yes

☐ No (If no, give the approximate date of disposition): _____

7. What was the result of the case? (For example: Was the case dismissed? Was judgment entered in your favor? Was the case appealed?)

VII. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 1 day of May, 2023.

Signature of Plaintiff

Jada Davis bey.
39771-3D-16
St. Louis City Justice Center
200 S. Tucker Boulevard

General Delivery

St. Louis, MO 63103-3000

Mailing Location upon Release

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